

AB:ML

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

SHARON ROBINSON,

Defendant.

REMOVAL TO THE
DISTRICT OF COLORADO

(Fed. R. Crim. P. 5)

Case No. 23-MJ-493

----- X

EASTERN DISTRICT OF NEW YORK, SS:

Oswaldo Cerrato, being duly sworn, deposes and states that he is a Deputy Marshal with the United States Marshals Service (“USMS”) in the FBI Joint Terrorism Task Force, duly appointed according to law and acting as such.

On May 17, 2023, the United States District Court for the District of Colorado issued a warrant for the arrest of the defendant SHARON ROBINSON based on an indictment charging her with making threats in interstate commerce, in violation of Title 18, United States Code, Section 875(c).

The source of your deponent’s information and the grounds for his belief are as follows:¹

1. On or about May 17, 2023, the defendant SHARON ROBINSON was charged by indictment in the United States District Court for the District of Colorado for making threats in interstate commerce, in violation of Title 18, United States Code, Section 875(c) (true

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

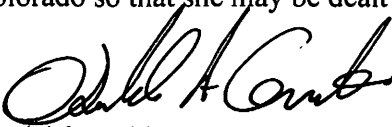
threat in interstate threat). A true and correct copy of the indictment is attached hereto as Exhibit A.

2. That same day, the United States District Court for the District of Colorado issued a warrant for ROBINSON's arrest. A true and correct copy of that warrant is attached hereto as Exhibit B.

3. On or about May 24, 2023, ROBINSON was arrested at 2945 W. 23rd Street, Apt. 15B, Brooklyn New York.

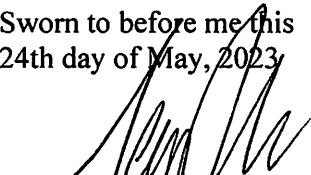
4. At the time of her arrest, ROBINSON confirmed her name, date of birth, and social security number with USMS. USMS also took her fingerprints, which alerted positive in the USMS booking database for an individual matching the name SHARON ROBINSON. USMS reviewed and confirmed that her name, date of birth, and social security number were consistent with that of the SHARON ROBINSON wanted in the District of Colorado.

WHEREFORE, your deponent respectfully requests that the defendant SHARON ROBINSON be removed to the District of Colorado so that she may be dealt with according to law.



/s/ Oswaldo Cerrato
Oswaldo Cerrato
Deputy Marshal
United States Marshals Service

Sworn to before me this
24th day of May, 2023



THE HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. **23-cr-274-RMR**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHARON ROBINSON,

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

At all times relevant to this Indictment, unless otherwise indicated:

INTRODUCTION

1. On or about November 19, 2022 Club Q, a lesbian, gay, bisexual, transgender, queer (LGBTQ) and otherwise inclusive club in Colorado Springs, was brutally attacked by a mass shooter who shot and killed five people and injured many more.

2. The mass shooting at Club Q received extensive and sustained coverage from local, state, and national media organizations in the days and weeks that followed.

COUNT 1

1. The allegations contained in paragraphs 1 and 2 are realleged and incorporated as if fully set forth in this paragraph.

2. On or about December 8, 2022, in the State and District of Colorado and elsewhere, the defendant,

SHARON ROBINSON

did transmit in interstate commerce a communication containing a threat to injure another; that is, ROBINSON, while located in the state of New York, placed a phone call from a cellular telephone to BUSINESS 2, known to the Grand Jury, which catered to the LGBTQ community and was located in Denver, Colorado, leaving a voicemail that included the following language

“They might shoot your bar up next you faggoty homos,
you sodomites”

which communication the defendant transmitted for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat.

Special Finding

3. The Grand Jury further alleges that SHARON ROBINSON intentionally selected the victims of her threat because of their actual and perceived sexual orientation.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 2

4. The allegations contained in paragraphs 1 and 2 are realleged and incorporated as if fully set forth in this paragraph.

5. On or about December 8, 2022, in the State and District of Colorado and elsewhere, the defendant,

SHARON ROBINSON

did transmit in interstate commerce a communication containing a threat to injure another; that is, ROBINSON, while located in the state of New York, placed a phone call from a cellular telephone to BUSINESS 1, known to the Grand Jury, which catered to the LGBTQ community and was located in Denver, Colorado, telling BUSINESS 1 OWNER, whose identity is known to the Grand Jury, among other things:

“They want to shoot you next faggot. You homosexuals. You big faggots. Sodomite pieces of shit. They gonna shoot you next. Gonna shoot you next you piece of shit. Faggots. G-G-Gonna kill you 1-2-3 faggot. Only you gay people. Faggot.”

which communication the defendant transmitted for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat.

Special Finding

6. The Grand Jury further alleges that SHARON ROBINSON intentionally selected the victims of her threat because of their actual and perceived sexual orientation.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 3

7. The allegations contained in paragraphs 1 and 2 are realleged and incorporated as if fully set forth in this paragraph.

8. On or about December 8, 2022, in the State and District of Colorado and elsewhere, the defendant,

SHARON ROBINSON

did transmit in interstate commerce a communication containing a threat to injure

another; that is, ROBINSON, while located in the state of New York, placed a phone call from a cellular telephone to BUSINESS 3, known to the Grand Jury, which catered to the LGBTQ community and was located in Glendale, Colorado, telling BUSINESS 3 OWNER , whose identity is known to the Grand Jury, among other things:

“I’m going to go over there and shoot you all” and

“You fucking faggots. I’ll shoot you. You’re going to die”

which communication the defendant transmitted for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat.

All in violation of Title 18 United States Code, Section 875(c).

Special Finding

9. The Grand Jury further alleges that SHARON ROBINSON intentionally selected the victims of her threat because of their actual and perceived sexual orientation.

COUNT 4

10. The allegations contained in paragraphs 1 and 2 are realleged and incorporated as if fully set forth in this paragraph.

11. On or about December 8, 2022, in the State and District of Colorado and elsewhere, the defendant,

SHARON ROBINSON

did transmit in interstate commerce a communication containing a threat to injure another; that is, ROBINSON, while located in the state of New York, placed a phone call from a cellular telephone to BUSINESS 4, known to the Grand Jury,

which catered to the LGBTQ community and was located in Denver, Colorado, telling BUSINESS 4 EMPLOYEE, whose identity is known to the Grand Jury, among other things:

“You’re gonna be shot up like Club Q”

which communication the defendant transmitted for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat.

Special Finding

12. The Grand Jury further alleges that SHARON ROBINSON intentionally selected the victims of her threat because of their actual and perceived sexual orientation.

All in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL:

Ink signature on file in Clerk’s Office
FOREPERSON

COLE FINEGAN
United States Attorney

By: /s/ Bryan Fields
Bryan Fields
Assistant United States Attorney
U.S. Attorney’s Office
1801 California St. Suite 1600
Denver, CO 80202
(303) 454-0100
Bryan.Fields3@usdoj.gov

EXHIBIT B

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

District of Colorado

United States of America

v.

SHARON ROBINSON

Case No. 23-cr-274-RMR

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) SHARON ROBINSON,

who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

COUNTS 1-4: 18 USC 875(c) (True threat in interstate commerce)

s/ A. Garcia Garcia - Deputy Clerk

Date: 5/17/2023

Issuing officer's signature

City and state: Denver, Colorado

Jeffrey P. Colwell - Clerk of Court

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title